

BellSouth Telecommunications, Inc.

Legal Department

1600 Williams Street

Suite 5200

Columbia, SC 29201

patrick.turner@bellsouth.com

Patrick W. Turner

General Counsel-South Carolina

803 401 2900

Fax 803 254 1731

September 23, 2003

The Honorable Gary E. Walsh  
Executive Director  
Public Service Commission of SC  
Post Office Drawer 11649  
Columbia, South Carolina 29211

Re: Application of BellSouth Telecommunications, Inc. to Provide In-Region  
InterLATA Services Pursuant to Section 271 of the Telecommunications Act of  
1996  
Docket No. 2001-209-C

Dear Mr. Walsh:

Enclosed for filing are the original and 15 copies of BellSouth Telecommunications, Inc.'s ("BellSouth's") performance data change Notification Reports for September 2003 and preliminary October 2003. These data change Notification Reports are being provided to inform the Commission of the changes BellSouth plans to make to its Performance Measures Analysis Platform ("PMAP") with September data, and previews the changes BellSouth is considering making for October data. A Data Disclosure Report for August 2003 would be filed at this time as well, if needed; however, for August 2003 there are no additional validated data issues to be disclosed that affect performance measurement calculations for which a fix has not yet been scheduled.

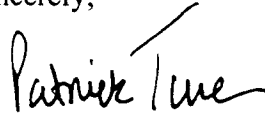
There are three additional matters that BellSouth would like to bring to the attention of the Commission and the parties. First, in its March 2003 Data Notification filed on February 11, 2003, BellSouth provided notice of coding changes necessary to correctly capture and report PMAP information due to Encore Release 12.0. This change, which was Item No. 1 on the Proposed March 2003 Data Notification, was not implemented completely for OSS-1, and BellSouth made additional coding changes with June 2003 data to address this problem.

Second, in its May 2003 Data Notification filed on April 3, 2003, BellSouth provided notice of a change to populate the Fatal Reject Column on the Percent Rejected

Service Requests report posted to the web. This proposed change, which was Item No. 1 on the Proposed May 2003 Data Notification, was not implemented correctly, and BellSouth will be making additional coding changes with September 2003 data to address this problem.

Finally, in its June 2003 Data Notification filed on May 19, 2003, BellSouth provided notice of a change by which OSS downtime hours will no longer be hard coded in PMAP but rather will be placed in a table making it easier to reflect changes in the downtime hours. This proposed change, which was Item No. 2 on the June 2003 Data Notification, was not implemented correctly, and BellSouth will be making additional coding changes with July data to address this problem.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick W. Turner". The signature is fluid and cursive, with a long horizontal stroke at the end.

Patrick W. Turner

PWT/nml

Enclosure

cc: All Parties of Record

## **PROPOSED SEPTEMBER 2003 DATA NOTIFICATION**

BellSouth proposes making the changes described in this document to generate results for the September 2003 data month. Results for the September 2003 data month will be posted as follows:

Preliminary results    October 21, 2003  
Final results            October 31, 2003

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

### **Ordering Measurements**

- (1) *Affected Measures:* O-7, O-8, O-9 & O-11

*Description of Change:* Reports for Local Interconnection Trunks for these measures are produced manually. BellSouth proposes to mechanize these reports in PMAP. This proposed change was Item (1) on the Preliminary August 2003 Data Notification filed on June 2, 2003. (RQ3203)

*Impact of Change:* None.

- (2) *Affected Measures:* PO-1

*Description of Change:* Currently, there is a discrepancy between the SQM and the MSS for this measure. The discrepancy is due to the assignment of duration for the MSS, which incorrectly calculates the benchmark as  $0 \leq 2.9999$  days. Because the benchmark is less than or equal to 3 days, BellSouth proposes to change the MSS code to report LSRs that have a duration of exactly 3 days within the benchmark interval and to not count the LSR as a miss. This proposed change was Item (3) on the Preliminary August 2003 Data Notification filed on June 2, 2003. (RQ3629)

*Impact of Change:* For March 2003 data, one of 76 LSRs (1.35%) was reported within the benchmark of  $0 \leq 3$  days in the SQM, but not in the MSS.

- (3) *Affected Measures:* OSS-1, OSS-2, and all Pre-Ordering & Ordering Measures

*Description of Change:* In anticipation of Encore Release 13.2 and the associated modifications to the sequence of data fields from BellSouth's source systems (e.g., LEO, LESOG, etc.), BellSouth proposes changes to PMAP to ensure that data is being correctly captured and reported. This proposed change was Item (1) on the Preliminary September 2003 Data Notification filed on July 1, 2003.

*Impact of Change:* None

- (4) *Affected Measures:* O-1, O-2 & O-11

*Description of Change:* BellSouth proposes to change the 'TAG' label on the measure to read 'TAG/LENS/XML' to match the systems that are currently reported as part of the current 'TAG' reporting structure. This proposed change was Item (2) on the Preliminary September 2003 Data Notification filed on July 1, 2003. (RQ3696)

*Impact of Change:* None.

- (5) *Affected Measures:* PO-1 & O-10

*Description of Change:* For measures involving Loop Make-up on Manual orders (Loop Make-up Response Time – Manual and Service Inquiry with LSR FOC Response Time – Manual), BellSouth has discovered a discrepancy with the ACNA tables that are used to produce CLEC specific data by which some CLEC data may be reflected with an incorrect ACNA. BellSouth proposes to correct this discrepancy. (RQ 1870)

*Impact of Change:* None.

- (6) *Affected Measures:* O-7 & O-11

*Description of Change:* Currently, Fully Mechanized and Partially Mechanized xDSL and EEL LSRs that are cancelled by a CLEC and that have not received either a FOC or a Clarification are being counted in the O-7 and O-11 measures. The business rules state that these records should be excluded from the measures. BellSouth proposes to correct the code so that these records will be excluded consistent with the SQM. (RQ2961)

*Impact of Change:* For May 2003, 132 of 3703 records (3.56%) should have been excluded.

### **Provisioning Measurements**

- (7) *Affected Measures:* P-1, P-2, P-3, P-3A, P-4, P-4A, P-5, P-6, P-7C, P-9, P-10 & P-11

*Description of Change:* Currently, number change orders associated with the voice service on lines with ADSL are being erroneously reported as ADSL orders. BellSouth proposes to correct the code to report such orders with the associated voice service product (e.g., 1FR, etc.) This proposed change was Item (4) on the Preliminary June 2003 Data Notification filed on April 1, 2003. (RQ3028)

*Impact of Change:* Less than .05% of orders will change.

- (8) *Affected Measures:* P-9

*Description of Change:* Currently, PMAP does not match ADSL troubles to ADSL orders, Line Share troubles to Line Share orders, nor does it match Line Splitting troubles to Line Splitting orders. There are seven types of trouble scenarios not associated with the line portion of an ADSL to retail, line sharing, or line splitting service, but which are improperly being associated with service orders for the provisioning of the data side of a line connection. These trouble scenarios are identified by Trouble Type Codes in LMOS and are as follows: 1xx (No Dial Tone); 2xx (Can't Call Other); 3xx (Transmission); 4xx (Can't Be Called); 5xx (Memory Service Failure); 7xx (Physical); and 8xx (Miscellaneous). The remaining Trouble Type Codes are 6xx and 9xx, which represent physical troubles with Data and Video/Internet/ISP failures and are appropriate to associate with recently completed service orders for Line Sharing, Line Splitting, and ADSL provided to retail services. BellSouth proposes to change the PMAP code to correctly match the trouble ticket to the appropriate service order product. This proposed change was Item (3) on the Preliminary September 2003 Data Notification filed on July 1, 2003. (RQ2413)

*Impact of Change:* Based on March 2003 data, the results would change as follows: ADSL provided to Retail would change from 16.32% to 9.94% regionally and CLEC Line Share would change from 10.66% to 3.86% regionally.

### **M & R Measurements**

- (9) *Affected Measures:* All M&R Measures

*Description of Change:* Currently, PMAP is misclassifying some DS1 services as EEL products. BellSouth proposes a coding change to begin using a class of service USOC as a filter to better distinguish EELs from DS1 services. This proposed change was Item (6) on the Preliminary August 2003 Data Notification filed on June 2, 2003. (RQ3403)

*Impact of Change:* Based on February 2003 data the Customer Trouble Report Rate for UNE Combo Other would increase from 4.26% to 4.45%.

### Special Access Measurements

- (10) *Affected Measures:* SA-2 (Georgia & Florida)

*Description of Change:* Currently, in the numerator of the FOC Receipt Past Due report, BellSouth is counting ASRs that have received a past due FOC during the month in addition to ASRs that have not received a FOC and are past due at the end of the month. The numerator of this measurement should only include ASRs that have not received a FOC and are past due at the end of the reporting month. BellSouth proposes correcting this issue. This proposed change was Item (6) on the Preliminary September 2003 Data Notification filed on July 1, 2003. (RQ3676)

*Impact of Change:* In April 2003 for Georgia, 207 ASRs were reported as past due for a percentage of 9.53. If only ASRs that did not receive a FOC were counted, only 61 ASRs would be reported as past due for a percentage of 2.81.

- (11) *Affected Measures:* SA-9 (Georgia and Tennessee only)

*Description of Change:* The posted numerator and denominator for the Annualized Failure Rate part of this measure are incorrect. Currently, total troubles are reported as the numerator and the sum of lines in service for the same period is reported as the denominator. Consistent with Appendix G of the SQM, the reporting and calculation will change to use average troubles for the preceding months as the numerator and average lines in service for the same preceding months as the denominator. BellSouth proposes to correct this calculation. This proposed change was Item (7) on the Preliminary September 2003 Data Notification filed on July 1, 2003. (RQ3747 and RQ3748)

*Impact of Change:* None.

- (12) *Affected Measures:* SA-5, SA-6 & SA-7 (Georgia, Florida and Tennessee only)

*Description of Change:* Currently PMAP is miscalculating the duration for these measures. If the completion date for the duration falls on a weekend or a holiday, the duration includes that weekend or holiday in the interval. BellSouth proposes correcting the calculation. This proposed change was Item (8) on the Preliminary September 2003 Data Notification filed on July 1, 2003. (RQ3814)

*Impact of Change:* For May 2003, 224 of 38,947 records had an additional day in the durations. For SA-6, ASR Receipt Date to FOC Due Date, 6 out of 9,827 records were affected, for ASR Receipt Date to Order Completion Date, 34 out of 18,356 records were affected and for ASR Receipt Date to Requested Due Date, 41 out of 9,822 records were affected. For SA-7, Past Due Circuits, 143 out of 143 records were affected.

## PRELIMINARY OCTOBER 2003 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the October 2003 data month. Results for the October 2003 data month will be posted as follows:

Preliminary results    November 21, 2003

Final results            December 1, 2003

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

### Ordering Measurements

- (1) *Affected Measures:* O-1, O-2, O-7, O-8, O-9, O-11, O-13, O-14 & O-15

*Description of Change:* For LENS (WEB) and TAG LSRs, PMAP is currently using the outbound timestamp from LEO. BellSouth proposes to use a new outbound time stamp in SGG which is closer to the CLEC interface. (RQ2028 & RQ3978)

*Impact of Change:* BellSouth continues to investigate the impact of the proposed change and will quantify this impact as soon as possible.

- (2) *Affected Measures:* O-11

*Description of Change:* Currently, this data is reported separately for EDI and TAG interfaces. The SQM does not require reporting of this measure at an interface specific level. BellSouth proposes to combine the EDI and TAG data and to cease reporting this data separately consistent with the SQM. (RQ3544)

*Impact of Change:* None

- (3) *Affected Measures:* O-1 & O-2

*Description of Change:* Currently, PMAP is not including XML transmissions in the data, and BellSouth proposes to correct this problem. (RQ3977)

*Impact of Change:* For May 2003 data, the number of TAG/LENS/XML records would increase by less than 0.01%.

- (4) *Affected Measures:* OSS-1

*Description of Change:* Reports for Average Response Interval for this measure are produced manually. BellSouth proposes to mechanize this report in PMAP. (RQ3988)

*Impact of Change:* None

#### **Provisioning Measurements**

- (5) *Affected Measures:* P-1, P-2A, P-2B, P-3, P-4A, P-4B, P-5, P-6 & P-9

*Description of Change:* Currently, data for certain Special Access to UNE Enhanced Extended Links (EEL) conversions are being captured incorrectly. BellSouth proposes using identifying characteristics on the service order to appropriately classify these circuits. (RQ3551)

*Impact of Change:* For March 2003, 17 orders would be affected by this change.

- (6) *Affected Measures:* P-13C (Georgia)

*Description of Change:* Under the SQM, the interval bucket for this measure is < 60 minutes. However, the PMAP coding currently measures performance as <= 60 minutes. Consistent with the SQM, BellSouth proposes changing the coding for the interval for this measure from <= 60 minutes to < 60 minutes and from > 60 minutes to >= 60 minutes. (RQ4111)

*Impact of Change:* Less than 0.1% reduction in results.



STATE OF SOUTH CAROLINA                    )  
  )     CERTIFICATE OF SERVICE  
COUNTY OF RICHLAND                        )

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s Proposed September and Preliminary October Performance Data Change Notification Reports in Docket No. 2001-209-C to be served upon the following this September 23, 2003:

Elliott F. Elam, Jr., Esquire  
S. C. Department of Consumer Affairs  
3600 Forest Drive, 3<sup>rd</sup> Floor  
Post Office Box 5757  
Columbia, South Carolina 29250-5757  
(Consumer Advocate)  
**(U. S. Mail and Electronic Mail)**

Sonia Daniels  
Law & Government Affairs  
AT&T – Southern Region  
1200 Peachtree Street, NE, Rm. 4080  
Atlanta, Georgia 30309  
(AT&T)  
**(U. S. Mail and Electronic Mail)**

Jocelyn G. Boyd, Esquire  
Staff Attorney  
S. C. Public Service Commission  
Post Office Box 11649  
Columbia, South Carolina 29211  
(PSC Staff)  
**(U. S. Mail and Electronic Mail)**

Russell B. Shetterly, Esquire  
P. O. Box 8207  
Columbia, South Carolina 29202  
(Knology of Charleston and Knology of South Carolina, Inc.)  
**(U. S. Mail and Electronic Mail)**

Darra W. Cothran, Esquire  
Woodward, Cothran & Herndon  
1200 Main Street, 6th Floor  
Post Office Box 12399  
Columbia, South Carolina 29211  
(MCI WorldCom Network Service, Inc.  
MCI WorldCom Communications and  
MCImetro Access Transmission Services, Inc.)  
**(U. S. Mail and Electronic Mail)**

John F. Beach, Esquire  
John J. Pringle, Jr., Esquire  
Ellis Lawhorne & Sims, P.A.  
Post Office Box 2285  
Columbia, South Carolina 29202  
(Resort Hospitality Services, Inc., NuVox  
Communications, Inc., AIN and Momentum Business  
Solutions, Inc.)  
**(U. S. Mail and Electronic Mail)**

Marsha A. Ward, Esquire  
Michael Henry, Esquire  
MCI WorldCom, Inc.  
Law and Public Policy  
6 Concourse Parkway, Suite 3200  
Atlanta, Georgia 30328  
(MCI)  
**(U. S. Mail and Electronic Mail)**

Frank R. Ellerbe, Esquire  
Bonnie D. Shealy, Esquire  
Robinson, McFadden & Moore, P.C.  
1901 Main Street, Suite 1500  
Post Office Box 944  
Columbia, South Carolina 29202  
(NewSouth Communications Corp., SCCTA and SECCA  
and KMC Telecom III, Inc.)  
**(U. S. Mail and Electronic Mail)**

Genevieve Morelli  
Andrew M. Klein  
Kelley, Drye & Warren, LLP  
1200 19<sup>th</sup> Street, N.W.  
Washington, D.C. 20036  
(KMC Telecom III, Inc.)  
**(U. S. Mail and Electronic Mail)**

John D. McLaughlin, Jr.  
Director, State Government Affairs  
KMC Telecom, Inc.  
1755 North Brown Road  
Lawrenceville, GA 30043  
(KMC Telecom)  
**(U. S. Mail and Electronic Mail)**

Edward Phillips  
Attorney  
141111 Capital Blvd.  
Wake Forest, NC 27587-5900  
(Sprint/United Telephone)  
**(U. S. Mail and Electronic Mail)**

Scott A. Elliott, Esquire  
Elliott & Elliott  
721 Olive Street  
Columbia, South Carolina 29205  
(Sprint/United Telephone)  
**(U. S. Mail and Electronic Mail)**

Marty Bocoock, Esquire  
Director of Regulatory Affairs  
1122 Lady Street, Suite 1050  
Columbia, South Carolina 29201  
(Sprint/United Telephone Company)  
**(U. S. Mail and Electronic Mail)**

Faye A. Flowers, Esquire  
Parker Poe Adams & Bernstein LLP  
1201 Main Street, Suite 1450  
Columbia, South Carolina 29202  
(US LEC)  
**(U. S. Mail and Electronic Mail)**

William R. Atkinson, Esquire  
3100 Cumberland Circle  
Cumberland Center II  
Atlanta, Georgia 30339-5940  
(Sprint Communications Company L.P.)  
**(U. S. Mail and Electronic Mail)**

Andrew O. Isar  
Director – State Affairs  
7901 Skansie Avenue, Suite 240  
Gig Harbor, WA 98335  
(ASCENT)  
**(U. S. Mail and Electronic Mail)**

Nanette Edwards, Esquire  
ITC^DeltaCom Communications, Inc.  
4092 S. Memorial Parkway  
Huntsville, Alabama 25802  
**(U. S. Mail and Electronic Mail)**

Timothy Barber, Esquire  
Womble, Carlyle, Sandridge & Rice  
3300 One First Union Center  
301 South College  
Suite 3300  
Charlotte, North Carolina 20202  
(AT&T)  
**(U. S. Mail and Electronic Mail)**

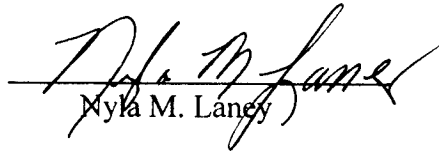
Traci Vanek, Esquire  
McKenna & Cuneo, LLP  
1900 K Street, N.W.  
Washington, DC 20006  
(AT&T)  
**(U. S. Mail and Electronic Mail)**

Tami Azorsky, Esquire  
McKenna & Cuneo, LLP  
1900 K Street, N.W.  
Washington, DC 20006  
(AT&T)  
**(U. S. Mail and Electronic Mail)**

Michael Hopkins, Esquire  
McKenna & Cuneo, LLP  
1900 K Street, N.W.  
Washington, DC 20006  
(AT&T)  
**(U. S. Mail and Electronic Mail)**

William Prescott, Esquire  
1200 Peachtree Street, N.E.  
Suite 8100  
Atlanta, Georgia 30309  
(AT&T)  
**(U. S. Mail and Electronic Mail)**

John A. Doyle, Jr., Esquire  
Parker, Poe, Adams & Bernstein, L.L.P.  
150 Fayetteville Street Mall, Suite 1400  
Raleigh, North Carolina 27602  
(US LEC of South Carolina)  
**(U. S. Mail and Electronic Mail)**



Nyla M. Laney

PC Docs # 401224